

1 **CHRISTENSEN JAMES & MARTIN, CHTD.**

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6 *of the Painters & Floorcoverers Joint Committee, et al.*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 BOARD OF TRUSTEES OF THE
9 PAINTERS AND FLOORCOVERERS
10 JOINT COMMITTEE, *et al.*,

11 Plaintiffs,

12 vs.

13 SUPER STRUCTURES INC., a Nevada
14 corporation dba SUPER STRUCTURES, *et*
14 *al.*,

15 Defendants.

CASE NO.: 2:18-cv-01364-GMN-EJY

STIPULATION AND ORDER TO
EXTEND DEADLINES TO FILE JOINT
PRETRIAL ORDER (FIFTH
REQUEST)

Date: N/A

Time: N/A

16 Plaintiffs (“Plaintiffs” or “Trusts”), by and through their attorneys, Christensen James &
17 Martin, Chtd., and Defendants, Super Structures Inc., Super Structures, Inc., Tracey Reynolds,
18 Robert Reynolds, and Western National Mutual Insurance Company (“Defendants”), by and
19 through their attorneys, Cook & Kelesis, Ltd., pursuant to LR IA 6-1 and LR 16-5, hereby
20 jointly move and request this Court’s Order continuing the deadline for submission of the Joint
21 Pretrial Order. This is the Parties’ fifth request for extension of the deadline for the Joint
22 Pretrial Order.

23 On July 20, 2021, the Settlement Conference before Magistrate Judge Youchah was
24 concluded without a settlement. Pursuant to the Court’s Order dated March 2, 2021 [ECF No.
25 79], the Joint Pretrial Order is due 30 days from completion of the Settlement Conference. The
26 Parties have calculated August 19, 2021 as the due date.

27 Plaintiffs’ counsel has a preplanned vacation July 31-August 8 and Defendants’ counsel
28 has preplanned vacation August 6-15 and personal days August 17-18. Due to these conflicts,

1 the parties will not be able to complete a Joint Pretrial Order by August 19, 2021. Additionally,
 2 there is a Motion for Fees and Costs [ECF No. 63] and a Motion for Reconsideration [ECF No.
 3 72] pending that may impact the remaining claims in this Case and the content of the Joint
 4 Pretrial Order.

5 The Parties respectfully submit that the reasons set forth above constitute good cause
 6 for extension of the deadline for the Joint Pretrial Order. Therefore, the Parties request an
 7 additional 30 days to submit the Joint Pretrial Order, making a new deadline of Monday,
 8 September 20, 2021. This request is not sought for any improper purpose or other purpose of
 9 delay.

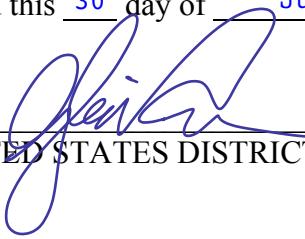
10 Dated this 30th day of July 2021.

11 Submitted & Approved by:
 12 CHRISTENSEN JAMES & MARTIN, CHTD.
 13 By: /s/ Wesley J. Smith
 14 Wesley J. Smith, NV Bar #11871
 15 7440 W. Sahara Avenue
 16 Las Vegas, Nevada 89117
 17 *Attorneys for Plaintiffs Board of Trustees*
 18 *of the Painters & Floorcoverers Joint*
 19 *Committee, et al.*

Approved by:
 COOK & KELESIS, LTD.
 By: /s/ Marc P. Cook
 Marc P. Cook, NV Bar #4574
 517 S. 9th St.
 Las Vegas, NV 89101
Attorneys for Defendants Super Structures
Inc., et al.

17 **IT IS SO ORDERED.**

18 Dated this 30 day of July 2021.

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 22 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On the date of filing of the foregoing papers with the Clerk of Court, I caused a true and correct copy to be served in the following manner:

ELECTRONIC SERVICE: Pursuant to Local Rule LR IC 4-1 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address(es):

ELECTRONIC MAIL: By sending the above-referenced document via electronic mail to those persons and those addresses listed below:

CHRISTENSEN JAMES & MARTIN

By: /s/ Natalie Saville